

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

DAVID B. TRACEY, *et al.*,

*Plaintiffs,*

v.

No. 16-cv-11620-NMG

MASSACHUSETTS INSTITUTE OF  
TECHNOLOGY, *et al.*,

*Defendants.*

**PLAINTIFFS' UNOPPOSED MOTION FOR  
FINAL APPROVAL OF CLASS SETTLEMENT**

Plaintiffs move under Federal Rule of Civil Procedure 23(e) for final approval of the class action settlement and for the Court to enter the proposed Final Order and Judgment. Defendants do not oppose the grant of final approval.

For Plaintiffs' part, this motion is supported by Plaintiffs' Memorandum in Support of Motion for Preliminary Approval of Class Settlement (Doc. 291), Plaintiffs' Memorandum in Support of Motion for Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards for Named Plaintiffs (Doc. 302-01), the Declaration of Dr. Stewart Brown (Doc. 302-08), the Declaration of James C. Sturdevant (Doc. 302-07), the Declaration of Neil Richards (Doc. 302-09), the Declaration of Sanford Rosen (Doc. 302-06), the Statement of Newport Trust Company, serving as the Independent Fiduciary, approving of the Settlement, including attorneys' fees and expenses (attached as Exhibit 1), the Declaration of Analytics Consulting LLC, this Court's Order preliminarily approving this Settlement and setting the final fairness hearing (Doc. 298), as well as Plaintiffs' accompanying memorandum in support of this motion.

Dated: May 12, 2020

/s/ Jerome J. Schlichter

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### **CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 12, 2020.

/s/ Jerome J. Schlichter